

REMARKS

Reconsideration and allowance of the above identified patent application are requested. Claims 1 and 25 have been amended as suggested by the previous Office Action and no new matter has been added. The Office's rejections are respectfully traversed.

Rejection Under 35 U.S.C. §101

Claims 1-28 stand rejected under 35 U.S.C. §101. The previous Office Action (of December 21, 2006 at 2) states (underlining added for emphasis) "The invention is a system of software with a define purpose but the 'medium' is not directed to a 'computer readable medium'. Regarding claims 1-28, changing the word 'medium' to 'computer readable medium' would overcome this rejection." In accordance with the Office's suggestion, Claim 1 has been amended to recite "A business solution management system comprising software stored in a computer readable medium,...." Further, Claim 25 has been amended to recite "A computer-implemented method comprising...." Therefore, in view of these remarks, withdrawal of the rejection of these claims under §101 is respectfully requested.

Rejection Under 35 U.S.C. §102

Claims 1-31 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,339,832 to Bowman-Amuah ("Bowman"). These contentions are respectfully traversed for at least reasons set forth below.

CLAIM 1

Claim 1 recites "A business solution management system comprising software stored in a computer readable medium, the software being operable to allow a user to (a) design a business solution with user parameters and user-selectable, pre-defined business objects and pre-defined technology objects, and (b) maintain and modify the business solution designed by the user."

The current Office Action (at 3) asserts that "Bowman anticipates design a business solution with user parameters and user-selectable 'User-selectable' of applicant is equivalent to

'practitioners will select the necessary components' of Bowman. (Bowman, C20:24-32), pre-defined business objects and pre-defined technology objects ('Parameters' is equivalent to 'domain' of Bowman. (Bowman, C14:34-41) 'Business objects' of applicant is equivalent to 'objects' of Bowman. (Bowman, C14:34-41) 'Technology objects' of applicant is equivalent to 'classes' of Bowman. (Bowman C14:34-41).” Bowman fails to disclose all of the claimed subject matter.

For example, Bowman does not disclose designing a business solution with user parameters and user-selectable, pre-defined business objects and pre-defined technology objects. In contrast, Bowman (Col. 20, lines 10-41) discloses frameworks and states that (underlining added for emphasis) “A Framework should be thought of as a conceptual structure used to frame the work about to be done.” Bowman (*Id.*) also discloses that (underlining added for emphasis) “..., it is helpful to have an inventory of the components that may be required for the design, build, installation and operation of systems. It is also helpful to have an understanding of how the components fit together conceptually.” Thus, Bowman teaches that frameworks provide a conceptual model to determine what components may be required for an application and how the components fit together. Put simply, Bowman's framework is not equivalent to a business solution with user parameters and user-selectable, pre-defined business objects and pre-defined technology objects.

Further, the Office Action cites to the phrase “practitioners will select the necessary components” in Bowman's discussion of frameworks as support for the assertion that Bowman discloses user-selectable, pre-defined business objects. Bowman, however, states (underlining added for emphasis) “Based on the inventory of components and the description of their relationships, practitioners will select the necessary components for their design. An architect extracts components from one or more Frameworks to meet a specific set of user or application requirements.” Thus, Bowman teaches that components are selected from a framework to meet user or application requirements. Components, however, are not equivalent to user-selectable, pre-defined business objects. Indeed, the Office Action (at 3) agrees that components are not equivalent to user-selectable, pre-defined business objects and instead states that (underlining added for emphasis) “‘Business objects’ of applicant is equivalent to ‘objects’ of Bowman....”

Bowman, however, also does not disclose 'objects' that are equivalent to user-selectable, pre-defined business objects. For example, Bowman (Col. 14, lines 34-41) states (underlining added for emphasis):

Thus, as is explained above, a framework basically is a collection of cooperating classes that make up a reusable design solution for a given problem domain. It typically includes objects that provide default behavior (e.g., for menus and windows), and programmers use it by inheriting some of that default behavior and overriding other behavior so that the framework calls application code at the appropriate times.

Bowman (Col. 14, lines 16-21) also discloses (underlining added for emphasis):

Application frameworks reduce the total amount of code that a programmer has to write from scratch. However, because the framework is really a generic application that displays windows, supports copy and paste, and so on, the programmer can also relinquish control to a greater degree than event loop programs permit.

In short, Bowman teaches that objects provide default behavior within a framework that is a generic application. A generic application is not equivalent to a business solution. Further, an object providing default behavior, as disclosed by Bowman, is not equivalent to a user-selectable, pre-defined business object. Therefore, Bowman does not disclose, teach, or suggest *inter alia* software operable to allow a user to design a business solution with user parameters and user-selectable, pre-defined business objects and pre-defined technology objects, as is claimed.

Moreover, with respect to user-selectable, pre-defined business objects, the specification (para. 00272) discloses (underlining added for emphasis) "Business Process Object Management 522 (Fig. 5) provides standard BSM 'business objects,' which encompass 'business areas' 1202, 'processes' 1204, 'activities' 1206 and 'steps' 1208...." The Office Action (at 3-4) asserts "'Processes' of applicant is equivalent to 'design artifact' of Bowman. (Bowman, C137:27-43) Per Bowman, the 'design artifact' provides a 'logical framework'. Per applicant the 'processes' provides a 'product roadmap' (§0007). Thus 'Product roadmap' of applicant is equivalent to 'logical framework' of Bowman." The Applicants disagree.

It appears that the Office Action misconstrues paragraph 0007 of the specification, which states (underlining added for emphasis) "A complete 'business solution' may include (a) targeted business goals,...(b) targeted business processes, e.g., a detailed analysis and improvement or

replacement proposal for the sales channel management process could be included; (c) technology and/or product roadmap that will implement the business processes, e.g., sales system and infrastructure mappings of both the current and the proposed designs;....” Thus, the specification discloses that a technology and/or a product roadmap can be used to implement a business process. Contrary to the Office’s assertion, the specification does not state that processes provide a product roadmap.

Further, the “processes 1204” disclosed in the specification are not equivalent to the “design artifact” disclosed by Bowman. The specification (para. 00275) discloses (underlining added for emphasis) “The business process object 1204 provides the business objectives and goals of the process scope.” Bowman (Col. 127, lines 27-43), states (underlining added for emphasis):

As a design artifact, early in the process, Business Components provide an underlying logical framework for ensuring flexibility, adaptability, maintainability, and reusability. They serve to break down large, complex problems into smaller, coherent elements. They also model the business in terms of the real-world concepts that make up the domain (e.g., entities, business processes, roles, etc.).

Thus, Bowman discloses that “Business Components” model the business in terms of real-world concepts and provide a logical framework. Bowman does not teach that business components provide the business objectives and goals of the process scope. As such, the “Business Components” or “design artifacts” disclosed by Bowman are not equivalent to a business process object.

For at least the reasons provided above, Bowman does not disclose, teach, or suggest software being operable to allow a user to (a) design a business solution with user parameters and user-selectable, pre-defined business objects and pre-defined technology objects, and (b) maintain and modify the business solution designed by the user, as is claimed. Therefore, Claim 1 is allowable over Bowman. Claims 2-24 depend from claim 1 and are allowable for at least the reasons discussed with respect to Claim 1.

CLAIM 25

Claim 25 recites “A computer-implemented method comprising: providing at least first and second software applications, the first software application being operable to allow a user to design a business solution with user parameters and user-selectable, pre-defined business process objects and pre-defined technology objects, the second software application being operable to allow a user to maintain and modify the business solution; and providing a data repository comprising the pre-defined business process objects and pre-defined technology objects.” As discussed above with respect to Claim 1, Bowman (Col. 20, lines 24-32) fails to teach, suggest, or disclose a business solution with user parameters and user-selectable, pre-defined business objects and pre-defined technology objects. Claim 25 is allowable over Bowman for at least this reason.

Further, the present Office Action (at 13) asserts (underlining added for emphasis) that “Bowman anticipates providing at least first and second software applications,... (Bowman, C116:52-57, C21:48-61; The ‘first agent’ and ‘second’ agent of applicant is equivalent to ‘system software’ and ‘management systems’ of Bowman.” But Bowman does not disclose first and second software applications that provide the claimed functionality. Instead, Bowman (Col. 116, lines 51-57) states “Infrastructure integration from PC to mainframe. The ability to interface with the host-based hardware, system software, and database management systems is critical. This is essential because the workflow system is located between the client-based and host-based processes, ie it can initiate client-based as well as host-based applications;...” Thus, Bowman teaches that a PC must be able to interface with the hardware, system software, and database management systems of a host. Bowman fails to disclose that system software is operable to allow a user to design a business solution with user parameters and user-selectable, pre-defined business process objects and pre-defined technology objects. Bowman also fails to disclose that the database management systems are operable to allow a user to maintain and modify the business solution.

Further, Bowman (*Id.*) clarifies that the host-based “management systems” called out by the Office are database management systems. Bowman (Col. 52, lines 32-34) discloses that “Most database management systems provide access control at the database, table, or row level as well as concurrency control.” Bowman does not, however, disclose, teach, or suggest that a

database management system is operable to allow a user to maintain and modify a business solution.

Additionally, Bowman (Col. 21, lines 48-61) discloses “The use of architecture frameworks during analysis and design can reduce the risks of an IT solution....Architectures provide a basic framework for major change initiatives. Clients’ core business is performed by strategic applications that will most likely require frequent and rapid development to handle changes in technology capability and business requirements.” Therefore, Bowman does not disclose, teach, or suggest providing at least first and second software applications, the first software application being operable to allow a user to design a business solution with user parameters and user-selectable, pre-defined business process objects and pre-defined technology objects, the second software application being operable to allow a user to maintain and modify the business solution, as is claimed.

Additionally, the Office Action asserts “‘Business process object’ of applicant is equivalent to ‘technology object’ per applicant in ¶0081.)” The Applicants disagree. The specification (para. 0081) discloses (underlining added for emphasis) “The Technology Component Identifier 240 may be invoked by the Solution Management application 230 to identify a particular class object, which can either be a representation of a Business Process Object or a Technology Object...” Thus, the specification indicates that a business process object is separate from a technology object, not that they are equivalent. Moreover, the language of claim 25 makes this distinction clear, reciting “...a data repository comprising the pre-defined business process objects and pre-defined technology objects.” Therefore, a business process object is not equivalent to a technology object.

For at least the reasons provided above, Bowman fails to disclose, teach, or suggest all of the claimed subject matter. Therefore, Claim 25 is allowable over Bowman. Claims 26-28 depend from Claim 25 and are allowable for at least the reasons discussed with respect to Claim 25.

CLAIM 29

Claim 29 recites (underlining added for emphasis) “An article comprising a machine-readable medium storing instructions operable to cause one or more machines to perform

operations comprising: prompting a user to select at least one business process object and one technology object; receiving user parameters; and designing a business solution using the selected business process object, technology object and user parameters.”

The current Office Action (at 15) asserts that (underlining added for emphasis) “Bowman anticipates prompting a user to select (Bowman, C20:24-32; ‘Prompting a user to select’ of applicant is equivalent to ‘practitioners will select the necessary components’ of Bowman.)” But Merely disclosing a selection is insufficient. Claim 29 calls for prompting a user to select at least one business process object and one technology object. Bowman, however, fails to disclose *inter alia* such aspects.

As discussed above with respect to Claim 1, Bowman (Col. 20, lines 24-32) states (underlining added for emphasis) “Based on the inventory of components and the description of their relationships, practitioners will select the necessary components for their design. An architect extracts components from one or more Frameworks to meet a specific set of user or application requirements.” Thus, Bowman discloses that “practitioner will select,” but fails to disclose prompting a user to select. Bowman also teaches that components are selected from a framework to meet user or application requirements. Components, however, are not equivalent to business process objects or technology objects.

The Office Action (at 15) asserts that “business objects” of the present application are equivalent to “objects” of Bowman” and that “technology objects” of the present application are equivalent to “classes” of Bowman. Regardless of the correctness of such assertions, the Office Action does not, however, assert that Bowman teaches selecting “objects” or “classes,” as is claimed. Moreover, as discussed above, Bowman teaches that objects provide default behavior within a framework that is a generic application. A generic application is not equivalent to a business solution. Further, an object providing default behavior, as disclosed by Bowman, is not equivalent to a business process object.

Further, Bowman does not disclose “classes” that are equivalent to technology objects. In contrast, Bowman (Col. 11, lines 11-15) states “It is worthwhile to differentiate between an object and a class of objects at this point, an object is a single instance of the class of objects, which is often just called a class. A class of objects can be viewed as a blueprint, from which many objects can be formed.” As such, Bowman distinguishes objects from classes. Thus, the

classes disclosed by Bowman are not equivalent to technology objects. Therefore, Bowman does not disclose, teach, or suggest prompting a user to select at least one business process object and one technology object. As Bowman does not disclose prompting a user to select at least one business process object and one technology object, Bowman also does not disclose, teach, or suggest designing a business solution using the selected business process object, technology object and user parameters.

For at least the reasons provided above, Claim 29 is allowable over Bowman. Claims 30-31 depend from Claim 29 and are allowable for at least the reasons discussed with respect to Claim 29.

Concluding Comments

By responding in the foregoing remarks only to particular positions taken by the Office Action, the Applicants do not necessarily acquiesce to other positions that have not been explicitly traversed. Additionally, the Applicants' arguments for the patentability of a claim presented in this response should not be understood to indicate that no further reasons for the patentability of that claim exist.

In view of the above remarks, Claims 1-31 should be in condition for allowance and formal notice of allowance is respectfully requested. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,



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